



**Linda S. Adams**  
*Secretary for  
Environmental Protection*

# Air Resources Board

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**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



**Arnold Schwarzenegger**  
*Governor*

October 15, 2008

Mr. Wayne Nastri  
Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105-3901

Dear Mr. Nastri:

This is in response to your letter to Governor Arnold Schwarzenegger, transmitting the United States Environmental Protection Agency's (U.S. EPA) modifications to the California Air Resources Board's (ARB) recommendations for area designations under the federal air quality standards for particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>).

We based the original recommendations on ambient PM<sub>2.5</sub> data measured from 2004 through 2006, considering both emissions impacting elevated PM<sub>2.5</sub> levels and public exposure to those levels. Reevaluation of these recommendations, based on 2005 through 2007 data, confirms our original assessment and recommendations for nonattainment area boundaries. We request that U.S. EPA modify the proposed nonattainment area boundaries to be consistent with California's recommendations. At issue are the proposed boundaries for the City of Calexico, Sacramento County, City of Chico, and the combined Cities of Yuba City/Marysville. We are in agreement on the boundaries for the South Coast Air Basin, San Joaquin Valley Air Basin, and San Francisco Bay Area. We have provided additional information to document the extent of international transport which causes localized impacts in Imperial County, and the localized impact of wood smoke in the other areas at issue.

An underlying premise for U.S. EPA's proposed PM<sub>2.5</sub> boundaries is to provide consistency with existing ozone and PM<sub>10</sub> nonattainment area boundaries. While that may be convenient from an administrative standpoint, the primary considerations in setting these boundaries should be scientific in nature. Our recommendations reflect the nature of the PM<sub>2.5</sub> problem in each area. Where the problem is more localized than regional, we have recommended technically based nonattainment area boundaries that differ from ozone area boundaries. We note several areas elsewhere in the country where proposed designations are not consistent with ozone and PM<sub>10</sub> nonattainment

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

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California Environmental Protection Agency

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area boundaries, such as those in the New York, New Jersey, Connecticut, and Tennessee. We request the same consideration.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Karen Magliano, Chief, Air Quality Data Branch, at (916) 322-7137.

Sincerely,

/s/

James N. Goldstene  
Executive Officer

Enclosures

cc: See next page.

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cc: Brad Poirez, APCO  
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